Case 19-13085-amc Down Fired 11/06/19 SALPKRENT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Adeline Paziora	 :	Case No.:19-13085-AMC	-
Debtor(s)	 : : ,	Chapter 13	

RESPONSE TO THE MOTION OF FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362

Comes Now, Adeline Paziora, hereinafter referred to as "Debtor" by and through the undersigned counsel and in response to the Motion for Relief from the Automatic Stay and in support thereof avers as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. It is Denied that the Debtor failed to make post-petition mortgage payments for the months of June, 2019 through October, 2019 for a total of \$6,614.05. By way of further answer, the Debtor has made a mortgage payment each month starting in June, 2019 through October, 2019. Lastly, the Debtor will be making their November, 2019 mortgage payment on November 7, 2019.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. Denied.

Dated: November 6, 2019

/s/Brad J. Sadek, Esquire Brad J. Sadek, Esquire Sadek and Cooper 1315 Walnut Street, #502 The Philadelphia Building Philadelphia, PA 19107 (215) 545-0008